

ORIGINAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

George Patterson	:	Civil Actions
Plaintiff,	:	
	:	
	:	No. 10-996
v.	:	
	:	Jury Trial Demanded
Bernard Avernoe d/b/a	:	
Freedom Used Cars	:	
Defendant.	:	

DEFENDANT'S ANSWER TO PLAINTIFF'S VERIFIED COMPLAINT

1. Admit.
2. Admit.
3. Admit.
4. Admit.
5. Admit.
6. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
7. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
8. Admit (Close the case conclude no discrimination).
9. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
10. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
11. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
12. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

13. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
14. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
15. Admit.
16. Admit.
17. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
18. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
19. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
20. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
21. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
22. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
23. Denied.
24. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
25. Denied.
26. Denied.
27. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
28. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
29. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
30. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

31. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
32. Denied. By way of further answer, when one car is on hold, the customer want to buy can come to the lot to check the car no test drive. Because the car is on hold, if the first customer for the car on hold don't buy, the customer can buy.
33. Denied. By way of further answer, I don't say right now, I say I hold the car for one customer name Jean-Luc Sandillon.
34. Denied. By way of further answer, He can't buy the car because the car is on hold, after negative answer for the hold, every customer is welcome to buy. This is correct business nobody can't test drive if the car is on hold.
35. Denied. I hold this car for days to customer Jean – Luc Sandillon.
36. Admit. I turn away because bad attitude for Mr. Patterson and friends, to say to me lets go is racist.
37. Admit.
38. Admit.
39. Admit.
40. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
41. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
42. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
43. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
44. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
45. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
46. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.

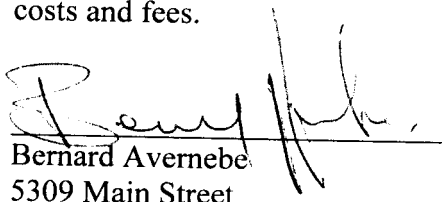
47. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
48. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
49. Admit.
50. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
51. Admit. \$11,950.00.
52. Denied. I say \$11,950.00 but I have strong French accent and when I say 11,950 the customer understand \$8,950.00. You can try to call me and you listen the same problem.
53. Denied. Not \$12,000.00. I say \$11,950.00.
54. He don't understand on the phone but he understand the price on the lot.
55. I can't sell the car under the price what I paid or I cannot keep open any business.
56. Denied.
57. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
58. No response required.
59. Denied. I don't think Mr. Patterson is member of racial minority. I am citizen American – Born to France and I don't think I am member of racial minority. To here USA when is one country open to everybody not regardless the gender.
60. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
61. Denied. Same answer to Number 59.
62. Denied.
63. Defendant lacks knowledge or information sufficient to form a belief about the truth of this allegation.
64. No response required.
65. I am not here to decide if Mr. Patterson is member of racial minority.
66. Denied. The car is on hold. I give two opportunities to Mr. Patterson to buy the car. I hung up the phone call to my lawyer, who call me and say is better to don't

call Mr. Patterson. If I have this problem to one car dealer, and the dealer call me to say if I want to buy the car because the hold customer don't want anymore, I go directly to the dealer, and give him the check to buy the car or one deposit. I think this complaint is only to try to make free money and help to one lawyer to make money when the lawyer knows he don't have any discrimination but try everything.

67. Denied.

68. Denied. I don't refuse to sell to Mr. Patterson. The car is on hold.

Wherefore, defendant requests that this suit be dismissed and the court award him costs and fees.


Bernard Avernebe
5309 Main Street
East Petersburg, PA 17520
717-581-0575

Date:

5/10/10

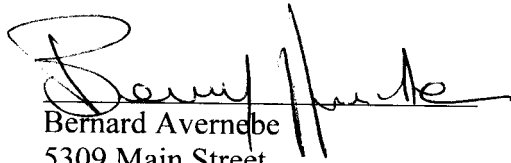
ORIGINAL

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am this day serving upon all persons listed below a true and correct copy of the foregoing document via first class mail on:

Sharon R. Lopez
Attorney for Plaintiff George Patterson
35 East Orange Street, Suite 301
Lancaster, PA 17602

Date: 5/10/10, 2010


Bernard Avernebe
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East Petersburg, PA 17520
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